

1 Rachael D. Lamkin (SBN 246066)
2 Karan Singh Dhodialla (SBN 296313)
BAKER BOTTS L.L.P.
3 101 California Street, Suite 3200
San Francisco, California 94111
4 Phone: (415) 291-6200
Fax: (415) 291-6300
5 rachael.lamkin@bakerbotts.com
karan.dhodialla@bakerbotts.com
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7 *Attorneys for Defendant*
NETFLIX, INC.

8 **UNITED STATES DISTRICT COURT**

9 **NORTHERN DISTRICT OF CALIFORNIA**

10 **OAKLAND DIVISION**

11 LAURI VALJAKKA,

12 v.
13 *Plaintiff,*

14 NETFLIX, INC.,

15 *Defendant.*

Case No.: 4:22-cv-01490-JST

**DECLARATION OF RACHAEL D.
LAMKIN IN SUPPORT OF DEFENDANT
NETFLIX, INC.'S OPPOSITION TO
RAMEY MOTION**

Judge: Hon. Jon S. Tigar

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1 I, Rachael D. Lamkin, hereby declare:

2 1. I am a partner with the law firm Baker Botts L.L.P. ("Baker Botts"), and counsel of
3 record for Defendant Netflix, Inc. ("Netflix") in the above-captioned matter.

4 2. I am admitted to practice in all state and federal courts in California, federal courts
5 in Colorado, the Eastern and Western Districts of Texas, the Eastern District of Michigan, and the
6 Third Circuit Court of Appeal. I am also admitted in the Federal Circuit, the International Trade
7 Commission, the Court of International Trade, and this Honorable Court.

8 3. I have personal knowledge of the facts stated herein.

9 4. Docket Navigator (DocketNavigator.com) is an online database that tracks patent
10 litigation in the United States.

11 5. On this date, I entered William Ramey's name in the database, and Docket
12 Navigator returned 1404 cases in which Ramey has entered appearances.

13 6. Attached as Exhibit A is a print-out of the first 300 cases (most recent 300 cases) in
14 which Ramey has entered an appearance. Docket Navigator only allows printing of the first 300
15 cases but in the upper right corner, the number 1404 is shown.

16 7. I have hand-counted so the number may be off a couple either way, but it appears
17 that Ramey has filed 198 cases in 2025. *See Exhibit A*, a true and correct copy of the Docket
18 Navigator print-out for this query.

19 8. Docket Navigator allows the user to apply filters such as "active" and inactive cases.
20 Docket Navigator shows that Ramey currently has 161 active cases. *See Exhibit B*, a true and
21 correct copy of the Docket Navigator print-out for this query.

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23 I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
24 and correct to the best of my knowledge.

25 Executed on 26th day of November 2025 in San Francisco, California.
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27 /s/ Rachael D. Lamkin
28 Rachael D. Lamkin